EXHIBIT C

Exhibit C

Google's Proposal for 19 Additional Custodians Compared with Plaintiffs' Proposal

Topic	Google's Proposal	Plaintiffs' Proposal
WAA (pages 2–3)	29,468	105,593
Public Representations and Consent (pages 4–5)	51,559	220,189
Storage and Use of Data (page 6)	36,073	124,037
GA for Firebase (page 7)	22,820	62,932
Firebase Writ Large (page 7)	0	15,632
FCM and AdMob (page 8)	5,539	6,662
Other Products (page 8)	2,204	84,105
User Experience (Arne de Booij) (pages 9–12)	4,417	16,151
Total[1]	**105,814**	**342,798**

Custodians

Google has divided the custodians into two groups[2] based on general job responsibility (Cols. 3–4 in the tables below):

- **GA4F/Firebase/Data:** GA for Firebase (Sree Pothana, Dan Stone); Firebase (Donald Harrison, Jason Titus); Data (Xinyu Ye)

- **WAA/Privacy/Counsel:** WAA (Greg Fair, Dale Nil, Nick Linkow, Katie Brennan (Virk), Jan Hannemann, Guemmy Kim, Mark Risher, Rahul Roy-Chowdhury); Privacy (Chris Ruemmler, Eric Miraglia, Sam Heft-Luthy, Stephan Micklitz); Counsel (Keith Enright)

*In some cases, Google's proposal treats a subset of the custodians within each group differently than the rest. For those, Google has indicated the subset by either job category (e.g., "Privacy") or by custodian name (e.g., "Fair only"), with further detail in footnotes where necessary.

Hit Count Charts

- Terms Google agrees to employ are indicated with an "X" and yellow highlighting.

- Terms in dispute are indicated with a hit count (e.g., ##,###) and red highlighting.

- Numbers in Column 1 of each table correspond to those in the proposed order.

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[1] Because multiple searches can return the same document, these calculated "totals" are less than numeric totals of the search hit counts for each topic. In other words, these totals represent the total number of additional documents for review *after* accounting for documents that contain multiple search terms.

[2] Google has separately addressed the User Experience custodian, Arne de Booij, at pages 9–12 below.

Web & App Activity (WAA)

No.[3]	Search Terms		GA4F / Firebase / Data	WAA / Privacy / Counsel
1.	WAA OR WAAH OR WAAs OR sWAA OR "W&AA" OR "W&AAs" OR "Web/App" OR "web history" OR WHSH OR (Web /2 "App Activity")		X	w/out Fair: 41,162[4]
2.	WAA OR WAAH OR WAAs OR sWAA OR "W&AA" OR "W&AAs" OR "Web/App" OR "web history" OR WHSH OR (Web /2 "App Activity")		X	X
	/50	disclos* "your activity" analytics scion function* "event data" "measurement data" firebase		
	/25	benefits "data collection" "privacy policy"		
	/10	plan* feature launch		
3.	WAA OR WAAH OR WAAs OR sWAA OR "W&AA" OR "W&AAs" OR "Web/App" OR "web history" OR WHSH OR (Web /2 "App Activity")		X	17,425
	/50[5]	benefits "data collection" "privacy policy" plan* feature launch		

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[3] Numbers in Column 1 of each table correspond to those in the proposed order.

[4] Plaintiffs have agreed to exclude Fair from their request for Term 1.

[5] Google has agreed to employ each of these terms in dispute—with the /25 connector (for benefits, "data collection", "privacy policy") or /10 connector (for "plan*", "feature", "launch"). *See* Term 2.

Web & App Activity (WAA)

No. [3]	Search Terms	GA4F / Firebase / Data	WAA / Privacy / Counsel
4.	WAA OR WAAH OR WAAs OR sWAA OR "W&AA" OR "W&AAs" OR "Web/App" OR "web history" OR WHSH OR (Web /2 "App Activity")	X	X
	/25 consent		
5.	WAA OR WAAH OR WAAs OR sWAA OR "W&AA" OR "W&AAs" OR "Web/App" OR "web history" OR WHSH OR (Web /2 "App Activity")	X	Privacy: X
	/50 consent		WAA + Counsel: 5,837
6.	(WAA OR sWAA OR WAAH OR "W&AA" OR "W&AAs" OR Firebase OR GA4F OR authenticat*) AND (CFS OR "Consent Flow Service")	X	X
7.	(WAA* OR sWAA OR "my account" OR "my activity") /50 "App Indexing"	X	X
8.	(WAA* OR sWAA OR "app activity") /15 ("My Account" OR "My Activity")	X	4,419
9.	("new ad control" OR "new ads control" OR "new ads controls" OR "new ad controlling" OR "new ads controlling" OR "new ad controls" OR "new ad controlled" OR "new ads controlled" OR NAC)	X	4,096
	/25 benefits scion "app activity" "data collection" "event data" AdMob "privacy policy" "measurement data" FCM consent* plan "Cloud Messaging" function feature firebase disclos* launch permi* analytics WAA* allow* GA4F sWAA		
	Google's Proposal (terms in yellow)	**29,468**	
	Plaintiffs' Proposal (all terms)	**105,592**	

Google's Public Representations and Consent

No.	Search Terms	GA4F / Firebase / Data	WAA / Privacy / Counsel
10.	"app activity"	X	15,706[6]
11.	"activity controls"	X	12,592[7]
12.	"your Google Account"	X	26,758[8]
13.	"activity data" OR "app data"	4,990	17,508
14.	"allow Google to save"	X	X
15.	"activities and info you allow Google to save"	X	X
16.	"your searches and activity"	X	X
17.	"to let Google save"	X	X
18.	"must be on"	X	X
19.	"on-device search"	X	X
20.	"Screenwise Trends"	X	X
21.	safeguard* /2 "your data"	X	X
22.	"Firebase Terms of Service"	X	X
23.	apps /4 "use Google services"	X	X
24.	"Google Data Collection"	X	X
25.	"defaulted to on"	X	X
26.	"Google Analytics browser add-on"	X	X
27.	"non-Google branded"	X	X
28.	"apps using Google Analytics"	X	X
29.	"data about app users"	X	X
30.	"what we collect" "data we collect"	X	WAA: X Privacy + Counsel: 3,853
31.	"use policy" automatic* /2 collect* product* AND (integrat* AND "third-party apps")	X	WAA + Privacy: X Counsel: 1,720

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[6] Excluding Fair.
[7] Excluding Fair and Hannemann.
[8] Excluding Fair and Hannemann.

Google's Public Representations and Consent

No.	Search Terms	GA4F / Firebase / Data	WAA / Privacy / Counsel
32.	("on OR off" OR "switch the collection") AND (WAA OR WAAH OR WAAs OR sWAA OR "W&AA" OR "W&AAs" OR "web history" OR "WHSH" OR (Web pre/2 "App Activity")) AND NOT ("Location History")	X	X
33.	"on OR off" OR "switch the collection"	GA4F + Data: X	Fair: X
		Firebase: 3,375	w/out Fair: 8,565
34.	"on/off" /5 control*	X	WAA: X
			Privacy + Counsel: 1,133
35.	"Privacy Policy" /15 (chang* OR amend* OR modif* OR alter*)	X[9]	n/a[10]
36.	"Privacy Policy" /10 (confus* OR inaccurate* OR (not /3 accurate*) OR incorrect* OR (not /3 correct*) OR mislead* OR wrong* OR false* OR flaw* OR (not /3 tru*) OR WAA* OR sWAA OR "my activity")	X	X
37.	("My Account" OR "My Activity") /15 (consent OR pseudonymous OR (still /5 collect*))	X	5,857
38.	(user* OR consumer* OR customer* OR people*) /10 (confus* OR misunderst* OR misle*)	X	53,338
39a[11]	(user* OR consumer* OR customer* OR people*) /10 (underst* OR comprehen* OR consent OR know OR represent* OR disclos*) /10 (WAA* OR sWAA OR GA4F OR "GA for Firebase" OR "Google Analytics" OR scion OR FCM OR "Firebase Cloud Messaging" OR AdMob)	X	X
39b	/20	3,848	5,766
40.	wiretap*	571	3,029
	Google's Proposal (terms in yellow)		**51,559**
	Plaintiffs' Proposal (all terms)		**220,189**

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[9] Excluding Ye.

[10] Not in dispute.

[11] The difference between 39a and 39b is the second connector (/10 versus /20).

Google's Storage and Use of Data

No.	Search Terms	GA4F / Firebase / Data	WAA / Privacy / Counsel
41.	"page_location"	X	X
42.	"page_referrer"	X	X
43.	"page_title"	X	X
44.	"screen_resolution"	X	X
45.	correlate* /5 data	X	X
46.	correlate /15 (user OR account OR profile)	X	X
47.	associate /2 account	X	X
48.	(associat* /15 (user OR account OR profile)) AND ("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion	X	X
49.	associat* /10 ((user OR account OR profile) /5 (data OR activit* OR event* OR interact* OR log*))	X	10,405
50.	(shadow OR secret OR hidden) /2 (profil* OR account)	X	X
51.	(((third pre/1 (party OR parties)) OR 3P) /2 develop*) AND ((collect* OR stor* OR "use" OR using OR delet* OR disclos*) /15 location)	X	X
52.	(authentic* OR reauthentic*) /10 (data OR log OR logs OR logged OR logging OR info OR information)	GA4F + Data: X Firebase: 3,523	24,687
53.	(PII OR ((personal OR personally) /5 info*)) /15 ((WAA* OR "sWAA") OR "app activity" OR consent OR pseudonymous OR (still /5 collect*) OR (join* /5 risk*))	X	10,913
54.	pseudony*	8,506	17,684
55.	("real time" /20 bid*) OR RTB	GA4F + Data: X Firebase: 3,729	Fair: X w/out Fair: 6,563
	Google's Proposal (terms in yellow)		**36,073**
	Plaintiffs' Proposal (all terms)		**124,037**

GA for Firebase

No.	Search Terms	GA4F / Firebase / Data	WAA / Privacy / Counsel
56.	"Google Analytics for Firebase" OR "GA for Firebase" OR GA4F	w/out GA4F: 1,671	X
57.	("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion) /25 gaia	X	X
58.	("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion) /15 (consent OR function OR disclos* OR plan OR feature OR benefits OR "data collection" OR "privacy policy")	X	WAA + Privacy: X Counsel: 1,298
59.	("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion) /10 launch	GA4F + Firebase: X Data: 1,128	X
60.	("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion) /15 (conversion* OR perform* OR event OR audience)	11,766	WAA: X Privacy + Counsel: 2,833
61.	Gold /5 conversion Gold /15 (((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* OR sWAA OR "my account" OR "my activity" OR AdMob OR FCM OR "Cloud Messaging" OR perform* OR event OR audience)	20,714	WAA: X Privacy + Counsel: 702
	Google's Proposal (terms in yellow)		**22,820**
	Plaintiffs' Proposal (all terms)		**62,932**

Firebase

No.	Search Terms	GA4F / Firebase / Data	WAA / Privacy / Counsel
62.	"Firebase SDK" OR "Firebase Software Development Kit"	Titus: 496	n/a
63.	Firebase /15 (((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* OR sWAA OR "my account" OR "my activity" OR perform* OR conversion* OR event OR audience OR appmeasurement OR AdMob OR "Google mobile service" OR GMS OR Clearcut)	11,330	3,806
	Google's Proposal (terms in yellow)		**0**
	Plaintiffs' Proposal (all terms)		**15,632**

FCM and AdMob

No.	Search Terms	GA4F / Firebase / Data	WAA / Privacy / Counsel
64.	(FCM OR "cloud messaging") /15 (Gold OR analytics OR GA4F OR scion OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* OR sWAA OR "my account" OR "my activity" OR conversion* OR perform* OR event OR audience)	GA4F + Data: X Firebase: 1,123	X
65.	AdMob /15 (Gold OR "Google Analytics" OR GA4F OR scion OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* OR sWAA OR "my account" OR "my activity" OR conversion* OR FCM OR "cloud messaging" OR "Google Mobile Platform" OR GMP)	X	X
Google's Proposal (terms in yellow)			**5,539**
Plaintiffs' Proposal (all terms)			**6,662**

Other Products (GMS, GMP)

No.	Search Terms	GA4F / Firebase / Data	WAA / Privacy / Counsel
66.	("Google Mobile Service" OR GMS) /25 ((Gold OR analytics OR GA4F) AND (log* OR user /2 data OR measurement))	2,139	X
67.	("Google Mobile Service" OR GMS OR Clearcut) /15 (Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP)	2,418	4,105
68.	("Google Mobile Services" OR GMS OR analytics OR perform* OR event OR audience) /15 AdMob	6,074	3,651
69.	("Google Mobile Service" OR GMS OR Clearcut) /10 (Gold OR analytics OR GA4F OR scion OR "Google Mobile Platform" OR GMP OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* OR sWAA OR "my account" OR "my activity" OR conversion* OR perform* OR event OR audience OR FCM OR "cloud messaging" OR AdMob)	3,608	13,442
70.	("Google Mobile Platform" OR GMP) /15 (conversion* OR perform* OR event OR audience)	1,349	180
71.	("Google Mobile Platform" OR GMP OR Analytics OR GA4F OR Scion) AND (((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* OR sWAA OR "my account" OR "my activity" OR AdMob OR FCM OR "Cloud Messaging" OR appmeasurement)	22,827	22,108
Google's Proposal (terms in yellow)			**2,204**
Plaintiffs' Proposal (all terms)			**84,105**

User Experience (Arne de Booij)

No.	Google's Proposal (<u>4,417</u> Documents)			No.	Terms in Dispute (<u>16,151</u> Documents)
WAA					
A1	("WAA" OR "WAAH" OR "WAAs" OR "sWAA" OR "W&AA" OR "W&AAs" OR "Web/App")			A2	"WAA" OR "WAAH" OR "WAAs" OR "sWAA" OR "W&AA" OR "W&AAs" OR "Web/App" OR "web history" OR "WHSH" OR (Web /2 "App Activity")
	AND	study studies confus* privacy understanding misunderst* misle* ppt* participant* CFS "Consent Flow Service"		A3	("WAA" OR "WAAH" OR "WAAs" OR "sWAA" OR "W&AA" OR "W&AAs" OR "web history" OR "WHSH" OR (Web pre/2 "App Activity")) /50 (consent OR plan* OR feature OR launch OR benefits OR "data collection" OR "privacy policy")
	/50	disclos* "your activity" firebase analytics scion function* "event data" "measurement data"		A4	("My Account" OR "My Activity") /15 (WAA* OR sWAA OR "app activity" OR consent OR pseudonymous OR (still /5 collect*))
	/25	consent benefits "data collection" "privacy policy"			
	/10	plan* feature launch			
Non-WAA					
B1	(user* OR consumer* OR customer* OR people*) /10 (underst* OR comprehen* OR consent OR know OR represent* OR disclos*) /10 (WAA* OR sWAA OR GA4F OR "GA for Firebase" OR "Google Analytics" OR scion OR FCM OR "Firebase Cloud Messaging" OR AdMob)			B2	(user* OR consumer* OR customer* OR people*) /10 (confus* OR misunderst* OR misle*)
				B3	(user* OR consumer* OR customer* OR people*) /10 (underst* OR comprehen* OR consent* OR know* OR represent* OR disclos*) /20 (WAA* OR sWAA OR GA4F OR "GA for Firebase" OR "Google Analytics" OR scion OR FCM OR "Firebase Cloud Messaging" OR AdMob)

User Experience (Arne de Booij)

No.	Google's Proposal (<u>4,417</u> Documents)	No.	Terms in Dispute (<u>16,151</u> Documents)
C1	"on/off" /5 control*	C4	"on OR off" OR "switch the collection"
C2	"on or off" AND (WAA OR WAAH OR WAAs OR sWAA OR "W&AA" OR "W&AAs" OR "web history" OR "WHSH" OR (Web pre/2 "App Activity")) AND NOT ("Location History")		
C3	"switch the collection" AND (WAA OR WAAH OR WAAs OR sWAA OR "W&AA" OR "W&AAs" OR "web history" OR "WHSH" OR (Web pre/2 "App Activity")) AND NOT ("Location History")		
D1	"allow Google to save" "your searches and activity" "page_location" "page_referrer" "page_title" "screen_resolution"		*See List Below at D2–D41*

Other Non-WAA Products and Terms (in Dispute)

D2.   "Google Analytics for Firebase" OR "GA for Firebase" OR GA4F

D3.   ("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion) /15 (plan OR feature OR benefits OR "data collection" OR "privacy policy" OR consent OR function OR disclos* OR conversion* OR perform* OR event OR audience)

D4.   ("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion) /10 launch

D5.   ("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion) /25 gaia

D6.   Gold /5 conversion

D7.   Gold /15 (((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* OR sWAA OR "my account" OR "my activity" OR AdMob OR FCM OR "Cloud Messaging" OR perform* OR event OR audience)

D8.   Firebase /15 (((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* OR sWAA OR "my account" OR "my activity" OR perform* OR conversion* OR event OR audience OR appmeasurement OR AdMob OR "Google mobile service" OR GMS OR Clearcut)

D9.   (FCM OR "cloud messaging") /15 (Gold OR analytics OR GA4F OR scion OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* OR sWAA OR "my account" OR "my activity" OR conversion* OR perform* OR event OR audience)

D10.   AdMob /15 (Gold OR "Google Analytics" OR GA4F OR scion OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* OR sWAA OR "my account" OR "my activity" OR conversion* OR FCM OR "cloud messaging" OR "Google Mobile Platform" OR GMP)

User Experience (Arne de Booij)

D11. ("Google Mobile Service" OR GMS) /25 ((Gold OR analytics OR GA4F OR firebase) AND (log* OR user /2 data OR measurement))

D12. ("Google Mobile Service" OR GMS OR Clearcut) /15 (Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP)

D13. ("Google Mobile Services" OR GMS OR analytics OR perform* OR event OR audience) /15 AdMob

D14. ("Google Mobile Service" OR GMS OR Clearcut) /10 (Gold OR analytics OR GA4F OR scion OR "Google Mobile Platform" OR GMP OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* OR sWAA OR "my account" OR "my activity" OR conversion* OR perform* OR event OR audience OR FCM OR "cloud messaging" OR AdMob)

D15. ("Google Mobile Platform" OR GMP) /15 (conversion* OR perform* OR event OR audience)

D16. ("Google Mobile Platform" OR GMP OR Analytics OR GA4F OR Scion) AND (((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* OR sWAA OR "my account" OR "my activity" OR AdMob OR FCM OR "Cloud Messaging" OR appmeasurement)

D17. ("new ad control" OR "new ads control" OR "new ads controls" OR "new ad controlling" OR "new ads controlling" OR "new ad controls" OR "new ad controlled" OR "new ads controlled" OR NAC) /25 (benefits OR "data collection" OR "privacy policy" OR consent* OR function OR disclos* OR analytics OR GA4F OR scion OR "event data" OR "measurement data" OR plan OR feature OR launch OR WAA* OR sWAA OR "app activity" OR AdMob OR FCM OR "Cloud Messaging" OR firebase OR permi* OR allow*)

D18. RTB OR ("real time" /20 bid*)

D19. "App Indexing" /50 ((WAA* OR "sWAA") OR "my account" OR "my activity")

D20.   "your Google Account"

D21. "what we collect" OR "data we collect"

D22. "Screenwise Trends" OR "Firebase Terms of Service"

D23. "use policy"

D24. safeguard* /2 "your data"

D25. "on-device search" OR "to let Google save" OR "must be on"

D26. product* AND (integrat* AND "third-party apps")

D27. apps /4 "use Google services"

D28. "app activity" OR "activity controls"

D29. automatic* /2 collect*

D30. "activity data" OR "app data"

D31. correlate* /5 data

D32. correlate /15 (user OR account OR profile)

D33. associate /2 account

D34. associat* /10 ((user OR account OR profile) /5 (data OR activit* OR event* OR interact* OR log*))

D35. (associat* /15 (user OR account OR profile)) AND ("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion)

D36. (authentic* OR reauthentic*) /10 (data OR log OR logs OR logged OR logging OR info OR information)

D37. (shadow OR secret OR hidden) /2 (profil* OR account)

D38. pseudony*

User Experience (Arne de Booij)

D39.   wiretap*

D40.   (((third pre/1 (party OR parties)) OR 3P) /2 develop*) AND ((collect* OR stor* OR "use" OR using OR delet* OR disclos*) /15 location)

D41.   (PII OR ((personal OR personally) /5 info*)) /15 ((WAA* OR "sWAA") OR "app activity" OR consent OR pseudonymous OR (still /5 collect*) OR (join* /5 risk*))